



State of Ohio Environmental Protection Agency

4476

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September 13, 2002

Mr. Johnny Reising
USDOE FEMP
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: IMPLEMENTATION PLAN FOR AREA 2, PHASE II

Dear Mr. Reising,

Ohio EPA has reviewed DOE's June 2002 submittal on the, "Implementation Plan for Area 2, Phase II, 200450-PL-0001 Rev A DRAFT." Based upon this review, Ohio EPA's comments are enclosed.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

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OHIO EPA COMMENTS ON A2P2 IMPLEMENTATION PLAN

1. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: The document needs to be revised to incorporate details regarding the on-going characterization and excavation occurring within Subarea 4 to the west of Subarea 1, hereafter referred to the "Parking Lot." Additionally, a discussion of how the characterization activities failed to find the disposal materials in this area is warranted.
2. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: Ohio EPA commented during our review of the A2P2 PSP for Predesign Sampling (Original Comment #11, DOE file 10/26/1999) that GPR and magnetometer should be utilized for locating past disposal areas. DOE's response concurred with our recommendation. However, the document does not discuss any such surveys and it would seem that such a survey would have located the buried pipes and possibly the concrete in the Parking Lot area. It would seem prudent for DOE to revisit the issue of GPR/magnetometer surveys in the areas west of the haul road to locate any additional disposal areas.
3. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: The document is quite confusing particularly with regard to what is located within or outside of Subarea 3. A better map than that provided in figure 1-2 is essential to understanding the scope of work included in this document. Additionally, it seems prudent that Subarea 3 should be removed from the document and submitted separately at a later date following appropriate characterization.
4. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: Adding to the confusion of the document is the use of specifications from multiple dates and projects. Ohio EPA understands the benefits of one sitewide set of specifications and would welcome such an approach, however the approached used in this document is unacceptable. The submittal received by Ohio EPA included 4 separate sets of specifications packages from two separate projects and 4 different dates (Doc 20300-TS-0001:July 2002; Doc 20800-TS-0002:April 2002; Tech Specs for 3A/4A:November 2001; Partial OSDF Phase IVSpecs August 2001). A number of which included the same spec with contradictory text and requirements that are not appropriate for this action. Until such time as an appropriate sitewide specifications package can be developed, this document must incorporate specifications specific to

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this project. As submitted, the specification packages made the document un-reviewable.

5. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:
Comment: Within A2P2 a significant amount of debris is scattered around such as HDPE pipe, rebar, fitting etc. The document does not address any of these materials. These materials need to be removed and properly disposed of as part of the Implementation Plan. Please include details on removal of all such debris and the prevention of additional debris placement in the area.

6. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.1 Pg. #: 1-2 Line #: 16-19 Code: C
Original Comment #:
Comment: Ohio EPA is unfamiliar with the stream corridor implementation plan. What is the date for submittal of this document and in what document is the schedule provided?

7. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.1 Pg. #: 1-2 Line #: 21-24 Code: C
Original Comment #:
Comment: There is some confusion regarding MTL-HRD-011. This section says it is not addressed while latter sections state it is a part of Subarea 3. Please clarify how this pile is being address and if the certification report addressed the soil below the pile. Additionally, how does DOE intend to manage the pile? Will it remain a pile or be blended into the area following certification?

8. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2 Pg. #: 1-3 Line #: 16-24 Code: C
Original Comment #:
Comment: a) Why is the footprint for MTL-HRD-12 delayed into Subarea 3?
b) Does this area include the piles located just up gradient of the SSOD and east of the former salt storage shed?
c) Does this area include the area immediately adjacent to the former AFP? In particular the bank area where contamination was found during A2P1 site prep? And the ditch that runs between the trailers and AFP?

9. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2 Pg. #: 1-3 Line #: 29-30 Code: C
Original Comment #:

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Comment: This sentence needs to be reworded to make clear that the Non-Impacted Material Stockpile 2 is only a footprint and **not** an existing stockpile.

10. Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.4.1 Pg. #: 1-5 Line #: 13-21 Code: C
 Original Comment #:

Comment: A) As stated in a previous comment, Ohio EPA believes that the predesign investigations must be completed before submittal of the IRDP. What investigations are on-going as referenced here?

B) This section claims that Subarea 3 will be completed at a later date. This is not implied in the Introduction.

C) This section says that there is "limited existing predesign investigation data" for Subarea 4. Is there a basis for this statement? If this is the case, shouldn't additional data be collected? The finding of disposal activities in the Parking Lot area suggests that relying upon "historical knowledge" is not sufficient and that additional characterization is warranted.

11. Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.4.2 Pg. #: 1-5 Line #: 31-33 Code: C
 Original Comment #:

Comment: A design drawing for the work proposed in Subarea 2 is essential. Design drawings are the most relied upon documentation during field work. Development of an appropriate design drawing with detailed notes will ensure that everyone is in agreement as to what actions are necessary in the area. Revise the document to include a detailed drawing for this remediation.

12. Commenting Organization: OEPA Commentor: OFFO
 Section #: 1.4.2 Pg. #: 1-6 Line #: 4-9 Code: C
 Original Comment #:

Comment: As stated in a previous comment, the submittal of 4 separate technical specifications package results in a document that is too confusing to interpret and would result in poor field implementation. Revision of the document to include project specific specifications is necessary.

13. Commenting Organization: OEPA Commentor: OFFO
 Section #: Section 1.4.2 Pg. #: 1-6 Line #: 15-16 Code: C
 Original Comment #:

Comment: Considering recent activities which have occurred in A2, Phase II, this Implementation Plan needs to incorporate them and the corresponding data.

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14. Commenting Organization: OEPA Commentor: OFFO
Section #: Section 1.4.6 Pg. #: 1-7 Line #: 15-16 Code: C
Original Comment #:
Comment: The document should include detail on post-remediation grading and topography as well as interim restoration activities. Subarea 1 has gone nearly a year with out any final grading or seeding. It is unacceptable to leave these areas unstablized until such time as final restoration plans are developed. At a minimum interim restoration grading and seeding details must be included.
15. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.5.3.1 Pg. #: 1-8 Line #: 28-32 Code: C
Original Comment #:
Comment: Update to reflect recent capture of Indiana Bat on site and continued monitoring (also update Table A-2, pA-2).
16. Commenting Organization: OEPA Commentor: OFFO
Section #: Section 1.5.3.2 Pg. #: 1-9 Line #: Code: C
Original Comment #:
Comment: The appropriate acreage is 11.5 for required mitigation due to the additional destruction caused in the trap range. This needs to be revised in all submittals, somehow it keeps getting repeated.
17. Commenting Organization: OEPA Commentor: OFFO
Section #: Section 1.6 Pg. #: 1-11 Line #: 36-38 Code: C
Original Comment #:
Comment: Not sure what a "primary COC for excavation" is but Uranium is certainly a primary COC for all areas at Fernald as defined in the SEP.
18. Commenting Organization: OEPA Commentor: OFFO
Section #: Section 1.6 Pg. #: 1-12 Line #: 21-27 Code: C
Original Comment #:
Comment: Obviously based upon the recent events in the Parking Lot area, additional effort needs to be placed on ensuring unwanted activities do not occur in areas following characterization/certification.
19. Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 1-1 Pg. #: Line #: Code: C
Original Comment #:
Comment: This map needs to be all inclusive of the areas in A2P2, i.e., A2P2 Part 3.
20. Commenting Organization: OEPA Commentor: OFFO

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Section #: Figure 1-2 Pg. #: Line #: Code: C

Original Comment #:

Comment: A large area lies outside of the Subarea 3 Trailer Complex Area, to its east and west of the SSOD, north of the AFP. Piles of debris/soil/ect are located in this area but are not discussed in the IRDP. Additionally there is flyash and some uranium contamination in the area adjacent to the AFP that are unaddressed. Revise the document to address these areas.

21. Commenting Organization: OEPA Commentor: OFFO

Section #: 2.1.1 Pg. #: 2-1 Line #: Code: C

Original Comment #:

Comment: There is confusion between Figure 1-2 and 2-1 regarding Subarea 3. As discussed in previous comments the scope of Subarea 3 needs clarification.

22. Commenting Organization: OEPA

Commentor: OFFO

Section #: 2.1.4 Pg. #: 2-2 Line #: 13-14 Code: C

Original Comment #:

Comment: Due to recent activities in A2P11, this sentence may need to be corrected.

23. Commenting Organization: OEPA

Commentor: OFFO

Section #: 2.2.3.2.2 Pg. #: 2-8 Line #: Code: C

Original Comment #:

Comment: Based upon Ohio EPA's observations in this area there appears to be concrete and other material disposed here. A survey by GPS and magnetometer seems warranted to help direct the excavation and to ensure material is not left behind.

24. Commenting Organization: OEPA

Commentor: OFFO

Section #: 2.2.3.3 Pg. #: 2-8 Line #: 15-22 Code: C

Original Comment #:

Comment: A) This section states that additional samples will be collected. As part of a predesign investigation, real-time is usually included as well as physical samples. The sampling should have been done prior to this IRDP via a separate PSP. In addition, the data should be included in this IRDP document, if Subarea 3 is suppose to be part of A2P11.

B) It is not acceptable to Ohio EPA to variance the sampling for Subarea 3 onto the existing A2P11 PSPs. Especially when Subarea 3 was not included in the existing predesign PSPs in the first place (refer to RtC on the PSP for Predesign Sampling in the Area 2, Phase II - Parts Two and Three).

25. Commenting Organization: OEPA

Commentor: OFFO

Section #: 2.2.3.4.1 Pg. #: 2-9 Line #: 14-18 Code: C

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Original Comment #:

Comment: Boring 11371 should have been bounded during the predesign investigation. A PSP is the process to be used to document this information or a variance of the PSP when it is determined a sampling point needs further confirmation. It is unclear as to why the PSP states that the boring is bounded, when in actuality this has not been done. Please explain.

26. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.2.3.4.1 Pg. #: 2-9 Line #: 25-30 Code: C

Original Comment #:

Comment: Due to the proximity to the South Field Disposal Area and the prior flyash removal nearby, Ohio EPA believes it is warranted to conduct further evaluation and bounding of this contamination.

27. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.2.3.4.1 Pg. #: 2-10 Line #: 1-12 Code: C

Original Comment #:

Comment: There appears to be a significant difference between the two sets of data. One showing above FRL Ra-226 and the other showing below FRL. Why would HPGe samples show such variation? The text should include an addition discussion and basis for the differences in the findings.

28. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.2.3.4.1 Pg. #: 2-10 Line #: 14-19 Code: C

Original Comment #:

Comment: a) How was the 3-foot scrape confirmed in capturing the extent of above-FRL soil contamination in A2P11 north of the east/west portion of the IMHR? The text states that "no further action is necessary" but doesn't provide any clarification. Please explain.

b) Is the reference to A1P1 here a typo?

29. Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.2.3.4.1 Pg. #: 2-10 Line #: 21-24 Code: C

Original Comment #:

Comment: If the area east of the IMHR has not been scanned in a predesign investigation and DOE claims that "process and historical knowledge indicates" that the area has not been impacted this is unacceptable to Ohio EPA. It seems prudent to at least conduct a real time survey in this area due to the obvious issues with process knowledge in these areas.

30. Commenting Organization: OEPA Commentor: OFFO

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Section #: 2.3 Pg. #: 2-10 Line #: 27 Code: C
Original Comment #:
Comment: Section 2.1.1 includes no discussion of COCs as referenced in this section.
No discussion of the COCs could be found other than in 2.3. Please clarify.

33. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.3 Pg. #: 2-11 Line #: Code: C
Original Comment #:
Comment: These bullets do not appear to determine primary COCs consistent with the
SEP which lays out primary and secondary COCs for remediation areas. Reductions to
that list require specific justification and discussion.

34. Commenting Organization: OEPA Commentor: OFFO
Section #: Table 2-6 Pg. #: 2-20 Line #: Code: C
Original Comment #:
Comment: The document does not provide sufficient justification for the reduction in the
list of ASCOCs. Disposal areas such as Subarea 2 and the Parking Lot area suggest
that no COC's should be reduced from the list as unknown disposal operations
occurred in these areas.

35. Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 2-13 Pg. #: Line #: Code: C
Original Comment #:
Comment: The copy of this map is illegible.

36. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.0 Pg. #: 3-1 Line #: 16 Code: C
Original Comment #:
Comment: It is unclear why the footprint of MTL-HRD-012 is included within Area 3
rather than completing it in a more timely manner under Area 4. Please clarify.

37. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.0 Pg. #: 3-2 Line #: 1-38 Code: C
Original Comment #:
Comment: Please include a set of full size drawings with the revised version of this
document.

38. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.0 Pg. #: 3-2 Line #: 14-19 Code: C
Original Comment #:
Comment: A construction drawing(s) is needed to ensure proper implementation of this

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removal.

39. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.0 Pg. #: 3-2 Line #: 28-33 Code: C

Original Comment #:

Comment: As stated previously the Tech Specs submitted with this document are very confusing and need to be specific to this project.

40. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.1.1.3 Pg. #: 3-3 Line #: 30 Code: C

Original Comment #:

Comment: This section is first to mention the idea of "associated utilities" relating to Basin 5 in Subarea 3. If the utilities are to be a part of this subarea, it needs to be mentioned in the "Remediation Area Background and Description" or another "appropriate-beginning" section of this document.

41. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.1.3 Pg. #: 3-5 Line #: 1-4 Code: E

Original Comment #:

Comment: A) This section should mention that surface water and runoff controls for A2P11 are also explained in Section 4.0 of this document.

B) In Lines 15 and 16, there seems to be a typo. Should the Subarea that's referenced be "1" instead of "2?"

42. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.1.3 Pg. #: 3-5 Line #: Code: C

Original Comment #:

Comment: This section should include a discussion on slope stabilization and revegetation following excavation.

43. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.1.3.1 Pg. #: 3-5 Line #: Code: C

Original Comment #:

Comment: Include requirements for revegetation.

44. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.1.3.2 Pg. #: 3-5 Line #: Code: C

Original Comment #:

Comment: a) Simple regrading will not be sufficient in this steep slope. The plan should include specific seeding and matting requirements for immediate installation following completion of the excavation.

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b) During prior field discussions, the concept of digging contamination out at the bottom of the slope and using the excavation as part of the stormwater controls was mentioned. A design drawing of the excavation depths and boundaries will help assess whether such a structure is appropriate.

45. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.1.3.3 Pg. #: 3-6 Line #: 5-6 Code: C
Original Comment #:
Comment: Sentence 5/6 may or may not be correct considering what's been uncovered in A2P11.

46. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.1.3.3 Pg. #: 3-6 Line #: 10-11 Code: C
Original Comment #:
Comment: Please include a sentence stating that the hose will be routed around the certified area between subarea 3 and the SWRB.

47. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.3.3.2 Pg. #: 3-13 Line #: Code: C
Original Comment #:
Comment: The excavation approach described in this section can minimize the disturbance to trees and vegetation, as long as the excavator can utilize the "arm" of the equipment without tearing down the vegetation. In addition, the bucket of the excavator should have a flat blade which will help minimize disturbance. If the excavator can stay stationary, this will also keep the ground underneath the equipment in tact. However, if the excavator has to move in and out of the area, this will cause rutting and disturb the area underneath the equipment as well.

48. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.1.3.3 Pg. #: 3-6 Line #: 25-31 Code: C
Original Comment #:
Comment: Why is part of the drainage going to the SWRB and part going directly to the SSOD? It would appear as though all should be going to the SWRB for treatment, or all should be directed away from the SWRB if treatment is not required. Water not treated in the SWRB and directed to the SSOD should not contain excessive suspended solids. A sediment trap should be constructed to treat water from the excavated area prior to discharge to the SSOD if silt fence will not be sufficient to treat runoff.

49. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.1.5.2 Pg. #: 3-7 Line #: 16-17 Code: C
Original Comment #:

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Comment: What, if any, soil disturbance, and sediment and erosion controls will be installed for lay down areas?

50. Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.1.6 Pg. #: 3-6 Line #: Code: C
 Original Comment #:
 Comment: The section should include reference to the use of real-time scanning during excavations as well.

51. Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.2 Pg. #: 3-6 Line #: 5-6 Code: C
 Original Comment #:
 Comment: Under which Subarea is the gravel road between the Silos Area and the Haul Road being removed? This area will need to be addressed as well.

52. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 3.3.3 Pg. #: 3-12 Line #: 20-32 Code: C
 Original Comment #:
 Comment: How will these criteria apply to the naturally very steep "Slope of Dread" in the Radium Hot Spot Area?

53. Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.3.3.2 Pg. #: 3-14 Line #: 18-21 Code: C
 Original Comment #:
 Comment: Though Ohio EPA concurs with intent to excavate under dry conditions, it is unclear if the proposal is just to dig the bottom under dry conditions or the entirety of the project? More clarification on schedule for this project is needed.

54. Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.3.4 Pg. #: 3-15 Line #: 5-10 Code: C
 Original Comment #:
 Comment: Again the approach to Subarea 3 is confusing. It is unclear how DOE intends to certify the surface soils prior to utility removal, particularly in light of the delay before initiating any remediation in the area.

55. Commenting Organization: Ohio EPA Commentor: DSW/OFFO
 Section #: 3.6 Pg. #: 3-18 Line #: Code: C
 Original Comment #:
 Comment: a) We do not encourage "grade to drain" in all circumstances. In many, if not most, instances the ponding of water and a relatively rough grade with irregular topography is desirable on site. This more accurately reflects the natural topography of

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the site, allows micro habitat for many indigenous flora and fauna, and in particular allows breeding areas for declining amphibian populations.

b) This section should include requirements for revegetation as part of the interim restoration grading. It is not acceptable to leave these areas unvegetated until final restoration is initiated.

56. Commenting Organization: OEPA Commentor: OFFO
 Section #: 4.1 Pg. #: 4-1 Line #: 31-32 Code: C
 Original Comment #:
 Comment: Ohio EPA believes there are wetlands in the area and the efforts must be made to limit impacts to them. This is particularly important in the Parking Lot area.

57. Commenting Organization: OEPA Commentor: OFFO
 Section #: 4.2.2 Pg. #: 4-4 Line #: 21-26 Code: C
 Original Comment #:
 Comment: Are the dust control methods/bullets listed in a sequential order? If so, the two methods which need to be listed at the top would include "applying a water mist" and "a cover to the load bed."

58. Commenting Organization: OEPA Commentor: OFFO
 Section #: 4.2.3 Pg. #: 4-7 Line #: Code: C
 Original Comment #:
 Comment: When past soil remediation activities have warranted monitoring stations, such as radon, the stations were set-up to monitor the area. This should also apply to A2P11.

59. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 4.3 Pg. #: 4-8 Line #: 27 Code: E
 Original Comment #:
 Comment: "and/or situation" should read "and/or siltation."

60. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 4.3 Pg. #: 4-8 Line #: 35-36 Code: C
 Original Comment #:
 Comment: There is no Section 3.5.1 referred to here, and (apparently) no specific surface-water monitoring tasks applicable to the A2P11 Project. Please elaborate.

61. Commenting Organization: OEPA Commentor: OFFO
 Section #: Design Pkage Pg. #: Line #: Code: C
 Original Comment #:
 Comment: In reviewing the Design Criteria Package, a lot of the technical specifications

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and language from 3A/4A DCP may or may not be appropriate. The language in the text and the specifications should be emended for A2P11, then applied.

62. Commenting Organization: OEPA Commentor: OFFO
 Section #: 5.1/DCP Pg. #: 8 Line #: First Paragraph Code: C
 Original Comment #:

Comment: Is using a 3D model for A2P11's conceptual design applicable? In addition, is the maximum limit listed for a slope 1.5:1V with 15 foot benches every 13 vertical feet appropriate for A2P11?

63. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 6.1.4.10 Pg. #: 6-12 Line #: 31 Code: C
 Original Comment #:

Comment: See earlier comment regarding Section 3.5.1

64. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Appendix D Drawings Pg. #: Drawing 99X-5500-G-00734 Line #: NA
 Code: C

Original Comment #:

Comment: Please add a note regarding the removal of ST-6 in/10 in HDPE 6 in carrier 10 in containment line along the east side of the certified area, that the certified area is not to be disturbed during removal of the pipe.

65. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Appendix D Drawings Pg. #: Drawing 99X-5500-G-00734 Line #: NA
 Code: C

Original Comment #:

Comment: This drawing shows the new receiving area as part of the trailer complex area to be excavated. This area is still having new concrete laid down in preparation for it being the new receiving area. What is the schedule for its excavation?

66. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Appendix D Drawings Pg. #: Drawing 99X-5500-G-00738 Line #: NA
 Code: C

Original Comment #:

Comment: The "Erosion Control Blanket Lined Ditch Detail" specifies "100% coconut fiber or jute mesh stitch bonded between heavy duty UV stabilized nets. See Specification Section 02275." We do not approve of the use of UV stabilized nets. Although Specification 02275 was not included in the package, I do not believe this is in the specification, and if it is, it needs to be changed.

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67. Commenting Organization: Ohio EPA Commentor: DSW
Section #: Drawings Pg. #: Drawing 99X-5500-G-00738 Line #: NA
Code: E

Original Comment #:

Comment: The detail for the silt fence for "Temporary Diversion Detail" refers to note 1 and there is no note 1.